

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Westside Lead - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #12
Progress
Westside Lead
C482
Atlanta, GA
Latitude: 33.7665090 Longitude: -84.4076280

To: James Webster, USEPA R4 ERRPB

From: Chuck Berry, OSC

Date: 8/25/2020

Reporting Period: August 10, 2020 - August 23, 2020

1. Introduction

1.1 Background

Site Number:	C482	Contract Number:	
D.O. Number:	68HE0420F0006	Action Memo Date:	5/6/2020
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/6/2020	Start Date:	1/6/2020
Demob Date:		Completion Date:	
CERCLIS ID:	GAN000407160	RCRIS ID:	
ERNS No.:		State Notification:	GA EPD
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Other - Historical use of contaminated fill prior to implementation of the Resource Conservation and Recovery Act (RCRA).

1.1.2 Site Description

1.1.2.1 Location

The Westside Lead Site is located in the English Avenue and Vine City neighborhoods of Atlanta, just west of downtown. The site is bounded by the former CSX rail line and Northside Drive to the east, North Avenue to the north, Oliver Street and Sciple Terrace to the west, and Foundry Street to the south. The address used is 395 Elm Street, Atlanta, Fulton County, Georgia 30314. The Site coordinates are Latitude: 33.7654320, Longitude: -84.4087470.

The Site is primarily residential with commercial and institutional property interspersed throughout, but particularly along the eastern border abutting the former rail line. Additionally, several large City parks are included in the boundary. Based on a parcel-by-parcel survey, there are 1085 residential properties within the entirety of the boundary. Most are single-family homes, although there are several multi-family properties within the area. Nearly all of the owners are absentee landlords renting out the property. Based on a lot-by-lot survey, EPA determined 35% of the property in the site is unimproved empty lots. Of the remaining 65% with structures on the property, 32% of those are abandoned or otherwise unoccupied, or about 21% of the properties as a whole. Based on this survey 56% of the properties have no residents living there.

1.1.2.2 Description of Threat

Refer to Initial POLREP for this information.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Refer to Initial POLREP for this information.

2. Current Activities

2.1 Operations Section

2.1.1 Previous Response Actions

Residential soil excavation began on January 27, 2020. For a detailed accounting of previous activity during this response, please see the prior Pollution Reports.

2.1.2 Response Actions This Reporting Period

Removal crews continued to excavate and backfill lead-contaminated soils from residential yards. Work continued on a large group of contiguous parcels on Vine and Elm Streets. These properties range in risk tiers from Tier 2 to Tier 5. There is a common drainage path for all 8 of these properties. With the loss of

the vegetative overgrowth, the area immediately sheds approximately 14,000 gallons of water for every inch of rainfall, which can occur quite rapidly during summer thunderstorms. Additionally, the local sewer system is incapable of managing rainfall events greater than about a 1 inch per hour rate. Rainfall rates greater than this result in substantial overland flow down the former creek drainage pathway, which runs directly through the restored area. Because of the need to manage this runoff in its entirety, the OSC initiated removal actions across all the lots at the same time, regardless of the risk tiers.

Installation of the overflow pathway for the infiltration trench continued, with installation of the drain and overflow standpipe. Gravel was placed in the trench to absorb the energy of the water so it doesn't rush out over the sidewalk on Elm Street. Future reporting periods will see the installation of the severe weather overflow channel in the berm. Excavation at 395 Elm Street was halted in order to leave a strip of original soil as a roadway to access the trenches along the back of the Vine Street properties. Once the trench overflow devices are installed, the remainder of 395 Elm will be excavated and the entire area sodded / seeded and restored.

Additionally, excavation at 528 Jones Ave was completed and backfilled. Restoration is ongoing but fencing repairs are delayed due to rain. Excavation and backfill at 636 Cameron Alexander and 488 Vine Street were completed and await cover cap. Excavation at 132 and 436 Elm Street was completed. Backfill and restoration is ongoing. Excavation and restoration at 422 Elm is ongoing, but is delayed due to installation of a new water main along John Street. The current water main lies within the property, and the City is moving the line into the roadway. The line is leaking, causing water to pond up in the yard. Backfill is impossible until the line break is fixed. The City estimates repairs will be complete the week of September 7.

2.1.2 Outreach and Community Involvement

RSES assumed control of the overall site outreach program on June 1. ERRPPB will continue to support outreach efforts as requested.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Enforcement activities continue. If a PRP is identified, appropriate action will be taken.

2.1.4 Progress Metrics

Metrics are current as of the end of the reporting period. Sampling metrics are still reported even though RSES is now managing the effort, as this provides some insight into future site activities under this Action Memorandum.

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SAMPLING	
Total Properties (estimated):	1085
Access Granted:	439
Properties Sampled:	380
Properties Requiring Removal (>400 ppm):	162
TIERS	
Tier 1 - Children present and soil Pb > 1,200 ppm	1
Tier 2 - Children present and soil Pb >400 and <1200 ppm	11
Tier 3 - Adults only and soil Pb >1,200 ppm	5
Tier 4 - Adults only and soil Pb >400 <1,200 ppm	36
Tier 5 - Unimproved or abandoned property with soil Pb >400	93
Not tiered, awaiting resident data	16
REMOVALS	
Properties Requiring Removal:	162
Properties in Progress:	7
Properties Completed:	34
Properties Remaining:	128
DISPOSAL	
Tons of non-hazardous soil:	11,684

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

EPA is excavating up to 2 feet of contaminated soil from residential properties within the Westside Lead Site boundary where soil concentrations exceed 400 parts per million lead.

2.2.1.2 Next Steps

ERRPPB will continue to focus on priority parcels as identified by RSEB.

2.2.2 Issues

Worker health and safety due to the coronavirus outbreak is of utmost concern. Workers are implementing and continually evaluating the SEMD COVID-19 protocols.

Afternoon thunderstorms have stopped or interrupted work frequently during this reporting period. Afternoon thunderstorms have hit the site nearly every day during this reporting period, although more often overnight. This has caused lots of lost time repairing topsoil or backfill prior to moving forward with additional soil. Until excavated areas can be sod or cover capped, this will remain an issue. For properties with residents, the sod applied will provide adequate cover, but for unoccupied or unimproved properties, simple straw is inadequate to provide enough erosion control on many properties. ERRS and the OSC are devising options for those properties where the slope leads to loss of the cover.

The site address and geographic coordinates have been changed to point to the site staging area at 431 Vine Street, Atlanta, GA 30318. Please note the zip code has changed as well, although this location is only a few hundred feet from the prior location on Elm Street. The new geographic coordinates are reflected in this document's introductory header.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

An Action Memorandum funding increase was signed on May 6, 2020, bringing the total site allocation, including contingency funds, to \$5,940,000. The Action Memorandum also exempted the site from the 12-month and \$2,000,000 statutory limits.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$4,450,000.00	\$3,500,000.00	\$950,000.00	21.35%
TAT/START	\$1,300,000.00	\$175,000.00	\$1,125,000.00	86.54%
Intramural Costs				
Total Site Costs	\$5,750,000.00	\$3,675,000.00	\$2,075,000.00	36.09%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

STAFFING THIS REPORTING PERIOD

OSCs: 1

CICs: 1

START: 1

ERRS: 17

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.